Privacy Policy

Wisebite Ltd. · wisebite.net · team@wisebite.net

This is an English translation of the Bulgarian privacy policy. In case of any discrepancy, the Bulgarian version prevails.

I. GENERAL INFORMATION

The platform “wisebite.net” is owned by Wisebite Ltd. (Уайзбаит ООД), registered in the Commercial Register of the Republic of Bulgaria under UIC (EIK) 207480123, with its registered office and address of management at: 4 Dame Gruev Blvd., floor 5, Blagoevgrad, Bulgaria. Wisebite Ltd. is a controller of personal data within the meaning of Article 4(7) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, “GDPR” or “the Regulation”), and as such is responsible for processing and storing your data in a fair, transparent and secure manner, in accordance with the requirements of the Regulation and national law, including the Bulgarian Personal Data Protection Act. The purpose of this policy is to inform you of all aspects of the processing of your personal data by the Company and of the rights you have in connection with that processing. Our contact details are: Wisebite Ltd. / Уайзбаит ООД E-mail: team@wisebite.net Website: wisebite.net

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II. DEFINITION AND TYPES OF PERSONAL DATA

Under Article 4 of Regulation (EU) 2016/679, “personal data” means any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. We collect and process the following categories of personal data: User data (e-mail address, name, etc.) This data is collected for the purposes of: contacting the user and sending information to them, registering the user in the online store, sending a newsletter, e-mails with specialised articles and news, promotions, promo codes and new features, and replying to an enquiry sent through the form on our website. Customer data (names, telephone, address, e-mail address, type of legal registration and registered office (where applicable), social media contacts, websites, statistics of your purchases, etc.) This data is collected for the purposes of: performing the platform’s obligations under a sales contract and the delivery of the purchased products. Marketing data This includes data relating to your preferences for receiving marketing information from us and from third parties, and your preferred means of communication. We process this data so that we can provide you with relevant and personalised content and advertising, and understand how effective that advertising is. Technical information Each time you open the Provider’s website or its various sections, the Controller receives information in the form of a log with the following content: your IP address and the page from which you were referred to our site; information about your visit to our web page and the sections you have visited; information about your browser and operating system; other technical information, in accordance with the technical requirements of the information system. Confidential data We do not collect confidential data relating to your racial or ethnic origin, political, religious or philosophical

beliefs, or trade union membership, genetic and biometric data, data concerning health, or data concerning your sex life or sexual orientation. The only exception is the processing of physical activity data in the mobile app, which takes place entirely on your device, on the basis of your explicit consent and without that data reaching us — see section VII. Please note that where we are required to collect personal data by law or under the terms of the contract between us, and you do not provide that data when requested, we may be unable to perform the contract (to deliver products to you). If you do not provide the requested data, we may have to cancel the products you have ordered, and you will be notified of this in good time.

III. PURPOSES OF PROCESSING

We collect and process the personal data you provide to us in connection with your use of the online store wisebite.net and the conclusion of a contract with the company, including for the following purposes: creating an account, administering the online store and providing all of its features; developing the business and determining a marketing strategy; identifying the party to the contract; accounting and statistical purposes; protecting information security; keeping records and bringing or defending legal claims; ensuring the performance of the contract for the provision of the relevant service or goods; sending a newsletter and e-mails with special offers with your explicit consent; answering enquiries made through the feedback form in the online store. When processing and storing personal data, Wisebite Ltd. may process and store personal data for the purpose of protecting the following legitimate interests: performing its obligations towards the National Revenue Agency, the Ministry of Interior and other state and municipal authorities. By visiting the website and clicking the button “I declare that I have read the documents referred to and accept them”, you give your consent for us to collect and process your personal data in accordance with this policy and the applicable law.

IV. RETENTION PERIOD

Having regard to the interests and needs of users, personal data is kept for the purposes of communicating with them or until they express a written wish for the personal data provided to be deleted. In all other cases, your personal data is kept for a period of no longer than six months after the purposes of its processing have been achieved.

V. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

We collect your data: on a contractual basis; where you have given your consent to its processing, on the basis of Article 6(1)(a) of the Regulation; if this is duly requested by a competent state or judicial authority; in performance of our obligations to maintain the website; in order to comply with a legal obligation that applies to us as the party processing your personal data; for the purposes of the legitimate interests of the Controller or of a third party.

VI. ADVERTISING ATTRIBUTION IN THE MOBILE APP (META)

The WiseBite mobile app uses a software development kit (SDK) of Meta Platforms Ireland Limited ("Meta") to measure the effectiveness of our advertising campaigns. For this purpose, Meta may receive information about events in the app — installation, first opening and account creation — together with technical identifiers of the device, including the advertising identifier (IDFA on iOS, or the Google Advertising ID on Android). On iOS devices, this data is used for tracking only after your explicit consent, given through Apple's App Tracking Transparency system dialog; if you refuse, the advertising identifier is not shared and Meta receives only aggregated, non-personalised data. On Android devices, you can reset or delete the advertising identifier at any time in the device settings. The processing is carried out on the basis of Article 6(1)(a) (consent) and Article 6(1)(f) (legitimate interest in measuring advertising) of the Regulation. More information about how Meta processes personal data can be found in Meta's Privacy Policy: https://www.facebook.com/privacy/policy.

VII. PHYSICAL ACTIVITY DATA FROM HEALTH CONNECT (ANDROID)

The WiseBite mobile app processes the following types of physical activity data from Google's Health Connect: Steps; Exercise sessions (type, title, start and end time, and duration); and Active calories burned. The app has read-only permissions — nothing is written back to Health Connect.

This data constitutes data concerning health within the meaning of Article 9 of the Regulation. It is processed solely on the basis of your explicit consent under Article 9(2)(a) of the Regulation, given through the Health Connect system dialog. Without this consent, the app does not access it.

The processing takes place entirely on your device. The app reads this data only while it is open and does not read it in the background. The data is not transmitted to WiseBite's servers, is not received or stored by us, is not shared with third parties and is not used for advertising purposes. The only things kept on the device are your settings for which types of data are turned on, not the data itself.

You can withdraw your consent at any time in Health Connect on your device — this removes the app's permission to access the data itself. You can also turn off "Activity from your phone" in Settings → Activity in the app — the app then immediately stops reading the data and stops showing your activity, while the permission granted in Health Connect remains until you remove it there. Withdrawal of consent does not affect the lawfulness of processing carried out before it.